

REMARKS

This Preliminary Amendment accompanies a Request for Continued Examination and is in response to the Office Action dated July 19, 2005 and the Advisory Action mailed on September 29, 2005. Claims 1, 3-12, and 14-23 are pending; claims 1 3, 8-10 and 16 have been amended, claims 2 and 13 have been canceled, and new claims 22-23 have been added. Reconsideration of the outstanding rejections are respectfully requested.

Independent Claim 1

In the outstanding Office Action, the Patent Office rejects claim 1 as being anticipated by Chui. According to the Patent Office, the step of “forwarding to the host server a portion of the address book contents which concerns the set of names after the names have been combined into the selection form” is inherent from Chui. The Patent Office cites to Column 17, lines 55-63 in support of this rejection:

postal or courier service) to the specified recipients. In this example, the front-end image ordering software would transmit electronically to the fulfillment enterprise various information, e.g., identifying the digital images to be printed, parameters for each digital print to be made (e.g., size, finish, number of copies, personal message, etc.), address information for each of the recipients, payment information, and the like, and then the fulfillment enterprise would utilize this information in fulfilling the order.

For the reasons noted below, Applicant submits that the teachings of Chui do not inherently describe or suggest that address information be included into a selection form as claimed so as to enable a user at the client machine to associate *from within the selection form* the one or more gift items with particular names in the set of names to thereby define a set of intended gift recipients.

The Patent Office is correct in regards to its statement that Chui teaches that information collected in the first instance can be maintained at the user's client system:

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The information used to fulfill an order could be collected from the user in the first instance and maintained in a data repository located either at the user's client system or at a remote server on a computer network available to the user's

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client system and/or to the fulfillment enterprise. Each distribution alias potentially would have its own associated data table.

(Col. 17, lines 64-66, *which paragraph continues to Col. 18, lines 1-3.*) Applicant's intention in advancing the argument that Chui does not maintain data at the client machine should have emphasized that data from an existing address book is not combined into a selection form for forwarding to a host server in a manner analogous to the claimed method.

Rather, Applicant's position with respect to the outstanding rejection is that Chui does not teach utilizing an address book maintained on the user's client machine so as to populate a *selection form* which the user then matches to gifts *from within the selection form* for forwarding to the host machine.

Respectfully, the Patent Office contends that "Chui welcomes any alternative 'mechanism or technique for identifying recipients' (see column 18, lines 19-20)," is not an inherent teaching to utilize the contents of a conventional address book maintained on a client machine in order to populate selection forms which a user then designates and matches persons to gifts from within the selection form.

Chui's teachings are that data is managed and utilized through "distribution aliases." The "distribution alias" can correspond to individual persons or to groups of persons, but in either case, there is no selection form that is completed for submission in Chui. Instead, the only interface that is taught for the photo-site has the user matching a photo to an alias or an alias to a photo without the use of a selection form. In the alternative embodiment in which Chui states that one can grab

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images from other web pages, the interface again has the user matching a web-image to an alias or an alias to a web-image without the use of a selection form.

The distribution aliases of Chui manage the parameters associated with groups or individual persons who are to receive photograph reprints. For example, at column 16, Chui describes the creation of an alias as follows:

25 A user can create a new alias, or modify an existing one,
using a separate window or interface element (e.g., a
"Create/Modify Alias window," not shown) dedicated to that
purpose. Such a Create/Modify Alias window could enable
the user to specify parameters associated with each distri-
bution alias, for example, the alias' name, its icon or other
graphic symbol, the identities of and contact information for
each of the alias' members, and various preferences
30 (delivery options, etc.) associated either with the distribution
alias as a whole and/or or with the alias' individual mem-
bers.

Applicant submits that the claimed steps which populate a selection form at a client machine and enable the user to make the associations of persons to gifts from within the selection form for forwarding to the host server is a different concept than the alias-to-image or image-to-alias methodology of Chui.

Chui has a further teaching that other interfaces could be used, including one in which a "standard address book metaphor" is utilized:

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The GUI of FIG. 5 represents only one of several alternative mechanisms or interfaces through which users could designate intended recipients of prints. For example, a standard address book metaphor, such as found in certain e-mail applications or personal information manager (PIM) programs, could be used to designate recipients. To do so, the user would select one or more recipients from among the user's address book entries and then specify which images should be printed and distributed to that user or those users. Or the process could proceed in the opposite order—the user could first specify images to be printed and then select one or more recipients from the user's address book. Alternatively, or in addition, the user could simply type in the contact information, for example, using a text entry form or command-line interface, to designate print recipients. Virtually any other mechanism or technique for identifying recipients could be used instead or in addition. For example, the user could access one of the several directory services available on the Internet (e.g., Bigfoot at <http://www.bigfoot.com>) to locate, identify and/or select print recipients.

FIG. 6 shows an example of a data table that could be used to store information relating to a particular distribution alias. As shown therein, the data table 600 in this example corresponds to the user's "Family" distribution alias, and includes six entries or rows 602, one for each of the members 504 of the distribution alias. The data table 600 can include multiple columns 606-612 in which information about each of the members 604 is stored. For example, the data table 600 can include columns for contact information 606 (shipping address, e-mail address, telephone number, etc.), default information (e.g., preferred print size, finish, number of copies, whether digital and physical copies of the image, or both, should be delivered, etc.), and delivery options 610 (e.g., Federal Express, customer pickup, U.S. Postal service, etc.). In addition, the data table 600 can store

However, there is no teaching as to how the contents of a client-side address book could be made available to a web page that is presented within a browser environment. Accordingly, Applicant submits that Chui is not an enabling reference in this regard. Certainly, Chui is silent as to permissions being provided in order to enable access to the address book and include any of its contents into a selection form. As noted above, Applicant submits that Chui fails to teach or suggest that an association of persons to gifts being made from within a selection form.

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Independent Claim 18

With respect to claim 18, this claim calls for downloading to a client machine a component from the host server and retrieving into the component names from an address book accessible from the client machine. The downloaded component includes a selection template which coordinates with information in the address book. Chui only generally describes a web page and access (see Fig. 5 and at column 18, lines 4-15 (excerpted above)), but lacks the selection cells or matrix or any hint of a purchase-facilitating interface which does not rely upon a direct image-alias association. In contrast, the methodology of claim 18 presents an unassociated matrix of gift items and potential recipients, as illustrated in Fig. 2 of the instant application, which enables a user at the client machine to assess his or her gift choices in view of other choices - a feature not taught or suggested by Chui. Further, as noted, Chui lacks an enabling disclosure as to how its interface supports a "standard address book metaphor." The claimed methodology enables web sites to extract address book information through a conventional web browser interface, and is submitted to differ from the methodology taught by Chui.

Reconsideration and withdrawal of the Section 102(e) rejection against claims 1-21 is respectfully requested.

New Claim 22

Claim 22 has been presented to claim certain aspects of the present invention disclosure, and is submitted to be allowable over Chui based on its dependence from claim 1 and in view of its further recitations. In particular, claim 22 recites the further step of "adding the gift items available for purchase from the host server to an electronic shopping basket" and has steps (b) through (f) performed "after the adding step in connection with a checkout by the user at the client machine." Chui, by contrast, teaches a "shopping" environment in which the association of images and aliases is made upon selecting images. See, e.g., Figs. 4 and 5 of Chui. There is no teaching or suggestion of adding gifts (e.g., photo images) to an electronic shopping basket and thereafter performing the

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Independent claim 23 has been presented to claim certain aspects of the present invention disclosure, and is submitted to be allowable over Chui. In particular, claim 23 recites a method for facilitating purchases of gift items that are made available for purchase from a host server in which gift items are added to an electronic shopping basket using a browser executing at a client machine, and a series of steps are performed in connection with a checkout by a user at the client machine. Chui does not teach or suggest several of the limitations of claim 23, including the step of “constructing a selection form which presents a matrix of selection cells, wherein each selection cell is at the intersection of a particular one of the added gift items from the electronic shopping basket and a particular name from the retrieved set of names.” For this reason alone, Chui does not anticipate nor does it render obvious claim 23, nor can it teach or suggest the further step of displaying in the browser the so-constructed selection form. Further, Chui does not teach or suggest prompting a user with “a permission request to access a particular address book including at least a set of names” or the step of testing the client machine “for the presence of a component on the client machine.” Nor does Chui teach or suggest the step of “enabling the user at the client machine to associate *from within the selection form* at least the particular one of the gift items with at least the particular name to thereby define a set of intended gift recipients.” Accordingly, claim 23 is submitted to be allowable over Chui and the art of record.

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A prompt and favorable action on the merits is requested

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Respectfully submitted,

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